

EXHIBIT J

From: [Nate Greene](#)
To: [Bedell, James](#); [Andrew Parker](#); [Lori Johnson](#); [Abraham S. Kaplan](#); [Cody Blades](#); [Joe Pull](#); [Amanda Oliver](#); [Roxanne A. Russell](#); [Jill Thorvig](#)
Cc: [Bloom, Michael](#); [Frey, Timothy](#); [Levine-Patton, Maura](#); [Loftus, Julie](#)
Subject: RE: Smartmatic v. Lindell - Upcoming Depositions
Date: Tuesday, October 3, 2023 2:34:35 PM
Attachments: [image001.png](#)

Hi James,

Dr. Shiva and Dr. Hursti have not yet been served despite our best efforts, so those depositions will not be going forward on those dates. The CISA deposition subpoena has been served but we have not yet received any response. We will keep you updated by Friday this week regarding that deposition.

Sincerely,

Nate

PARKER | DANIELS | KIBORT
 NATHANIEL R. GREENE

ATTORNEY

He/Him/His

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From: Bedell, James <JBedell@beneschlaw.com>
Sent: Monday, October 2, 2023 12:05 PM
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Subject: RE: Smartmatic v. Lindell - Upcoming Depositions

Counsel,

Can you please confirm whether the depositions for Dr. Shiva (currently noticed for October 6), Harri Hursti (currently noticed for October 9) and CISA (currently noticed for October 13) are going forward?

Best,
 James



James R. Bedell
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As of August 1, 2023 our new address is 127 Public Square, Suite 4900, Cleveland, OH 44114. Please update your records accordingly.

From: Bedell, James
Sent: Monday, September 25, 2023 8:06 PM
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Subject: Smartmatic v. Lindell - Upcoming Depositions

Counsel,

We wanted to get in touch regarding some of the upcoming noticed depositions:

- As of the time of this writing, we still do not have an update on Conan Hayes' intentions regarding the deposition scheduled for September 28. Consistent with Tim Frey's email to Abe Kaplan, we will keep you apprised of developments to this situation.
- To the extent it was not clear from our subsequent subpoena, the deposition of Brannon Howse will not be going forward on September 29. We have re-

noticed that deposition for October 18, but we do not have confirmation yet.

- You have noticed a deposition for J. Alex Halderman on October 2. Please confirm whether this deposition will be going forward.
- You have noticed a deposition for Dr. Shiva Ayyadurai on October 6. Please confirm whether this deposition will be going forward.
- You have noticed a deposition for Harri Hursti on October 9. Please confirm whether this deposition will be going forward.
- You have noticed a deposition for CISA on October 13. Please confirm whether this deposition will be going forward.
- You have noticed a deposition for Andrew Appel on October 16. Please confirm whether this deposition will be going forward.
- You have noticed a deposition for Thomas McNerney on October 16. Please confirm whether this deposition will be going forward.
- You have noticed a deposition for Alan Duke on October 18. Please confirm whether this deposition will be going forward.

Best,
James